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May 22, 2001

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

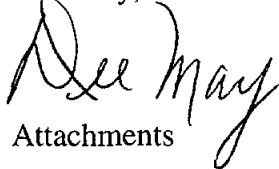
Re: CC Docket No. 99-301-In the Matter of Local Competition and Broadband  
Data Reporting

Dear Ms. Salas:

Today Verizon met with T. Beers, A. Feldman, E. Burton, J. Eisner, J. Berresford of the Common Carrier Bureau to discuss the above proceeding. Representing Verizon were D. Monroe, L. Thoms, L. Katz, A. Novell and me. The material presented in the meeting is attached.

Please feel free to give me a call if you have any questions.

Sincerely,

  
Attachments

cc: T. Beers  
T. Berresford  
E. Burton  
J. Eisner  
A. Feldman



# Local Competition and Broadband Reporting CC 99-301

**May 22, 2001**





# **Proposal Increases Reporting Burden with Little Increase in Value**

- Two dozen commentators overwhelmingly agree that the FCC proposal would:
    - create substantial burdens
    - generate very little if any additional value
  - Verizon estimates its cost burden would be in excess of \$9.5 million in the first year with increased annual cost of \$1.5 million annually
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# **Verizon Work Effort Burden**

- Verizon Analysis Methodology
- Cost Overview





## Limited Additional Value

- Data is not needed for purpose of evaluating local competition and broadband deployment
  - Current data provides necessary information
    - competitive choices by state and zip code
    - state broadband data provides extent of individual carriers deployment
    - competitive potential can be determined
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# **Recommendations for further disaggregation are not related to objective**

- Purpose is to “assess the degree of broadband deployment” yet supporters cite non-related benefits
  - Census purposes
  - Demographic purposes
  - Political districting and poll purposes





## **Recommendations for further disaggregation are not related to objective (continued)**

- Market share and competitive marketing purposes
- Purpose of the data submissions is NOT to provide companies with strategic corporate intelligence--that is the effect of the proposal





# Conclusion

- Additional reporting requirements are unnecessary
- Information must kept confidential
- Current reporting threshold and reports are appropriate and adequate to fulfill FCC's stated needs



## Reporting Burden

### Reporting burden

**Current:** 11 inputs x 32 state reports = 352 inputs  
**Proposed:** 30 inputs x 6,622 zip codes = 198,660 inputs

Current burden equates to 32 + pages of input

Proposal equates to 13,244 + pages for Broadband submission

### Potential Reporting burden

(if carriers used existing modes of distribution for Broadband but expanded service to majority of zip codes)

**Proposed:** 30 inputs x 30,000 zip codes = 900,000 inputs

Proposal equates to 60,000 + pages for Broadband submission.

### Possible burden

(if carriers used all modes of distribution for Broadband and expanded service to all zip codes)

**Proposed:** 122 inputs x 43,000 + zip codes = 5,246,000 inputs

Proposal equates to 86,000 + pages for Broadband submission